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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 SONOS, INC.,

12 Plaintiff,

13 vs.

14 GOOGLE LLC,

15 Defendant.

CASE NO. 3:21-cv-07559-WHA

Related to CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 160)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
8 160) filed in connection with Sonos’s Motion for Leave to File a Third Amended Complaint (Dkt. No.
9 159). If called as a witness, I could and would testify competently to the information contained
10 herein.

11 3. Google seeks an order sealing the materials as listed below:

12 Document	13 Portions Sonos Sought to Be Filed Under Seal	14 Portions Google Seeks to Be Filed Under Seal	15 Designating Party
16 Exhibit 2 to the Declaration of Cole Richter in Support of Sonos’s Motion for Leave to File a Third Amended Complaint (“Exhibit 2”)	17 Entire Document	18 Portions outlined in red boxes	19 Google
20 Exhibit 3 to the Declaration of Cole Richter in Support of Sonos’s Motion for Leave to File a Third Amended Complaint (“Exhibit 3”)	21 Entire Document	None	Google

22 4. I understand that the Court applies a “compelling reasons” standard to a sealing request
23 made in connection with a motion for leave to amend a complaint. *See, e.g., Space Data Corp. v.*
24 *Alphabet Inc.*, No. 16-CV-03260-BLF, 2019 WL 285799, at *1 (N.D. Cal. Jan. 22, 2019); *Sumotext*
25 *Corp. v. Zoove, Inc.*, No. 16-CV-01370-BLF, 2017 WL 8294292, at *1 (N.D. Cal. Aug. 15, 2017).

26 5. The portions of Exhibit 2 outlined in red boxes contain references to Google’s
27 confidential business information and trade secrets, including details regarding the architecture,
28 technical operations, and work flow strategies and processes of Google’s products. The specifics of

1 how these functionalities operate is confidential information that Google does not share publicly.
2 Thus, I understand that the public disclosure of such information could lead to competitive harm to
3 Google, as competitors could use these details regarding the architecture and functionality of Google's
4 products to gain a competitive advantage in the marketplace with respect to their competing products.
5 A less restrictive alternative than sealing would not be sufficient because the information sought to be
6 sealed is Google's confidential business information and trade secrets but has been utilized by Sonos
7 in support of Sonos's Motion for Leave to File a Third Amended Complaint.

8 I declare under penalty of perjury under the laws of the United States of America that to the
9 best of my knowledge the foregoing is true and correct. Executed on April 6, 2022, in San Francisco,
10 California.

11 DATED: April 6, 2022

12 By: /s/ Jocelyn Ma
13 Jocelyn Ma
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